

D. Douglas Grubbs (*Admitted PHV*)
Adam K. Pulaski (*Admitted PHV*)
PULASKI KHERKHER, PLLC
2925 Richmond Avenue, Ste 1725
Houston, TX 77098
Telephone: 713-664-4555
Facsimile: 713-664-7543
Email: dgrubbs@pulaskilawfirm.com
Email: adam@pulaskilawfirm.com

Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

*R.L. vs. Uber Technologies, Inc., et al.,
3:25-cv-05515;*

*P.T. vs. Uber Technologies, Inc., et al.,
3:25-cv-05677; and*

*S.W. vs. Uber Technologies, Inc., et al.,
3:25-cv-06329*

**MOTION TO WITHDRAW AS COUNSEL
OF RECORD FOR PLAINTIFFS P.T. AND
S.W. ONLY**

Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel of record (“Counsel”) for the above-referenced Plaintiffs, respectfully moves this Court for an Order allowing his firm to withdraw as counsel of record for Plaintiffs P.T. and S.W. Counsel does not seek withdrawal from Plaintiff R.L. as explained below.

Prior to Defendants filing their third show cause motion [ECF 4137], Counsel met and conferred with opposing counsel on October 7, 2025 to discuss the three additional “non-bona-fide receipts” that the above-referenced Plaintiffs previously provided to Counsel. After reviewing the ride receipts with opposing counsel, Counsel advised his firm’s intention to withdraw as counsel of record should the above-referenced Plaintiffs fail to provide additional

1 ride receipt proof. Relying on opposing counsel's representations asserted during the meet and
2 confer, Counsel contacted the above-referenced Plaintiffs via email the same day. Counsel
3 informed Plaintiffs of Defendants' concerns and requested that Plaintiffs provide any additional
4 proof of their ride at issue, *e.g.*, the summary email that Uber typically sends upon ride
5 completion. Counsel further attempted contacting the above-referenced Plaintiffs via telephone
6 on October 8 and 14, 2025. Upon Defendants filing their third show case motion [ECF 4137],
7 Counsel sent follow-up emails to the above-referenced Plaintiffs on October 14, 2025 as well as
8 mailed correspondence via 2-day Federal Express giving Plaintiffs until October 22, 2025 to
9 provide any additional proof otherwise Counsel would initiate the process of withdrawing as
10 their attorneys. As required by Local Rule 11-5(a), Counsel has provided written notice of
11 Counsel's intent to withdraw, reasonably in advance, to the above-referenced Plaintiffs as well
12 as notice to opposing parties.
13

14
15 At the time of filing this motion to withdraw, no additional ride receipt proof has been
16 provided by Plaintiffs P.T. or S.W. nor substitute counsel identified. However, on October 23,
17 2025, Plaintiff R.L. contacted Counsel and provided the ride summary emailed directly from
18 Uber. Counsel immediately uploaded said receipt to MDL Centrality and emailed opposing
19 counsel a courtesy copy of the additional ride proof. Counsel intends to proceed with R.L.'s
20 action against Defendants and does not intend to withdraw as counsel of record at this time.
21

22 WHEREFORE, the attorneys and law firm of Pulaski Kherkher, PLLC respectfully
23 request that they be allowed to withdraw as counsel of record for Plaintiffs P.T. and S.W. A
24 courtesy copy of this motion will be served upon Plaintiffs P.T. and S.W. at their last known
25 address and via electronic mail.
26
27
28

1 Dated: October 24, 2025

Respectfully submitted,

2
3 **PULASKI KHERKHER, PLLC**

4 /s/ D. Douglas Grubbs

5 D. Douglas Grubbs (*Admitted Pro Hac Vice*)

6 Adam K. Pulaski (*Admitted Pro Hac Vice*)

2925 Richmond Avenue, Suite 1725

7 Houston, Texas 77098

Tel: 713-664-4555

8 Facsimile: 713-664-7543

dgrubbs@pulaskilawfirm.com

9 adam@pulaskilawfirm.com

10 Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2025, I electronically transmitted the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: ubermdlservice@listserv.shb.com.

/s/ D. Douglas Grubbs
D. Douglas Grubbs